

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YULY ARONSON

Plaintiff,

- Against -

ANTHONY BRANCA,

Defendant.

ANSWER TO COUNTERCLAIMS

Case No. 07 CIV 9405

Assigned to Judge Karas

Plaintiff, YULY ARONSON, by and through his attorney, Law Office of Brian H. Reis,
Answers the Counterclaims as follows:

ANSWER TO FIRST COUNTERCLAIM

58. Plaintiff neither admits nor denies the allegations contained in Paragraph Number 58 of the Counterclaim, as no response is required, however, to the extent a response is required, all allegations of wrongdoing or monies owed are denied.

59. Plaintiff denies the inference that the Middle Patent Road property is owned by Bearhill Associates, LLC, avers that Plaintiff has equal ownership interests in the Middle Patent Road property, avers that Plaintiff and Defendant are the sole and equal owners of the interests in Bearhill Associates, LLC, admits that Bear Hill Associates LLC owns undeveloped land in Putnam County, and upon information and belief believes the undeveloped land in Putnam County to be 37 acres.

60. Plaintiff admits the allegations contained in Paragraph 60 of the Counterclaim.

61. Plaintiff denies knowledge or information sufficient to form a belief as to the truthfulness of the allegations set forth in Paragraph 61 of the Counterclaim

62. Plaintiff denies the allegations contained in Paragraph 62 of the Counterclaim.

63. Plaintiff denies the allegations contained in Paragraph 63 of the Counterclaim.

64. Plaintiff denies the allegations contained in Paragraph 64 of the Counterclaim.

ANSWER TO SECOND COUNTERCLAIM

65. Plaintiff neither admits nor denies the allegations contained in Paragraph Number 65 of the Counterclaim, as no response is required, however, to the extent a response is required, all allegations of wrongdoing or monies owed are denied.

66. Plaintiff denies knowledge or information sufficient to form a belief as to the truthfulness of the allegations set forth in Paragraph 66 of the Counterclaim

67. Plaintiff denies knowledge or information sufficient to form a belief as to the truthfulness of the allegations set forth in Paragraph 67 of the Counterclaim.

68. Plaintiff denies the allegations set forth in Paragraph 68 of the Counterclaim.

ANSWER TO THIRD COUNTERCLAIM

69. Plaintiff neither admits nor denies the allegations contained in Paragraph Number 69 of the Counterclaim, as no response is required, however, to the extent a response is required, all allegations of wrongdoing or monies owed are denied.

70. Plaintiff admits the allegations contained in Paragraph 70 of the Counterclaim to the extent that it relates solely to accounting services within the scope of the retainer agreement, but denies any other inference.

71. Plaintiff denies the allegations set forth in Paragraph 71 of the Counterclaim.

72. Plaintiff denies the allegations set forth in Paragraph 72 of the Counterclaim.

73. Plaintiff denies the allegations set forth in Paragraph 73 of the Counterclaim.

ANSWER TO THIRD COUNTERCLAIM

74. Plaintiff neither admits nor denies the allegations contained in Paragraph Number 74 of the Counterclaim, as no response is required, however, to the extent a response is required, all allegations of wrongdoing or monies owed are denied.

75. Plaintiff denies knowledge or information sufficient to form a belief as to the truthfulness of the allegations set forth in Paragraph 75 of the Counterclaim.

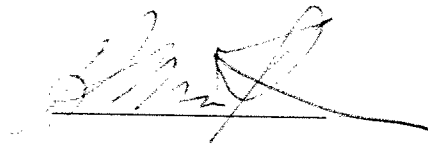
76. Plaintiff denies knowledge or information sufficient to form a belief as to the allegation that defendant “has been forced to bear the development costs”, and denies that Plaintiff has refused to pay his legitimate share of development costs and expenses.

77. Plaintiff denies the allegation contained in Paragraph 77 of the Counterclaim and avers that the relief sought is inappropriate.

78. Plaintiff denies the allegation contained in Paragraph 78 of the Counterclaim.

WHEREFORE, Plaintiff respectfully request that Relief sought by Defendant be denied in its entirety.

Dated: January 10, 2008
New York, NY

A handwritten signature in black ink, appearing to read 'Brian H. Reis', written over a horizontal line.

Brian H. Reis, Esq. (BS-7843)
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